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**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

BHRAC-AC, LLC d/b/a GOTHAM DREAM  
 CARS, LLC

Plaintiff,

v.

DREAMDEALERS USA, LLC d/b/a EXOTICS  
 RACING

Defendant.

Case No. 2:16-cv-01813-JCM-PAL

**STIPULATION AND (PROPOSED)  
 ORDER TO STAY PROCEEDINGS  
 (1st Request)**

COMES NOW, Plaintiff BHRAC-AC, LLC d/b/a GOTHAM DREAM CARS, LLC (“Plaintiff”) and Defendant DREAMDEALERS USA, LLC d/b/a EXOTICS RACING (“Defendant”), (collectively, the “Parties”), by and through their respective, undersigned, counsel of record, and do hereby stipulate and agree as follows:

1. On August 1, 2016, Plaintiff filed a Complaint for Declaratory Judgment in the United States District Court for the District of Nevada (ECF No. 1) (the “Complaint”), seeking declaratory judgment in regards to Defendant’s allegations of trademark infringement.

2. On August 12, 2016, Defendant sent Plaintiff a signed waiver of service of summons of the Complaint (“Waiver”).

3. This Waiver was filed with the Court on August 15, 2016. (ECF No. 8).

4. Accordingly, pursuant to Rule 4 of the Federal Rules of Civil Procedure, an answer or

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responsive pleading to Plaintiff's Complaint is due sixty (60) days from August 12, 2016, which would be October 11, 2016.

5. The Parties have engaged in settlement discussions, via written correspondence, and on August 24, 2016, the Parties, and their respective counsel, personally met and conferred in this matter.

6. During this settlement conference, the Parties reached a tentative settlement agreement in regards to Plaintiff's Complaint and Defendant's anticipated counterclaims and requests for injunctive relief.

7. The Parties are currently in the process of memorializing and finalizing the terms of their settlement, including an expected dismissal of all pending claims in this matter.

8. In order to facilitate the Parties' settlement efforts, as well as to minimize attorneys' fees and other legal expenses, Plaintiff and Defendant agree that the present civil action should be stayed for sixty (60) days.

9. This is the first such stipulation to stay proceedings in this matter.

10. Therefore, the Parties agree that the Court may enter the following Order and request that the Court do so accordingly:

- a. Except as otherwise provided below, this action shall be stayed for a period of sixty (60) days from the date an order on this stipulation is entered with the Court.
- b. The Parties stipulate that nothing in this delay shall be deemed to prejudice Defendant's right to seek necessary injunctive relief from this Court and/or to file any relevant counter-claims and/or third-party claims in this matter.

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/s/Daniella Flandez  
Daniella Flandez  
An Employee of THE AMIN LAW GROUP, NV., LTD.